

CONSULTATION RESPONSE FORM

National Development Framework: Issues, Options and Preferred Option		
Date: July 2018		
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We would like give stakeholders every opportunity to contribute to the preparation of the National Development Framework. To assist us with arranging engagement events, publicising consultations and keeping you up to date with progress on the NDF through our newsletter, we would like to include your contact details on our database.

Your details will not be used by us for any other purpose, and they will not be shared with any other organisation.

Tick the box, right, to OPT IN and be included on our engagement database, receive details of future engagement events and consultations, and receive the NDF newsletter by email

YES

Q1a	Do you have any comments on the findings of the Integrated Sustainability Appraisal (ISA) Interim Report?	X
	Yes	X
	No	

Comments

ISA Report

The ISA Report is commissioned to make sure that the principles of sustainability are embedded in all aspects of the NDF. It is mainly about scoping and methodology. This is understandable and necessary, but its position as Question 1a confuses the issue and deflects attention from the meat of the Consultation. With a suitable initial footnote and a one or two-line summary, it (and the HRA text as covered by Question 1b) would have been better located as final appended items thus leaving the present set of Questions from 2 onwards as the meat of the Consultation.

It is nevertheless in danger of limiting the scope of the NDF to matters of national significance using the criteria of existing designations. It does not provide any indication of how lower-tier locally significant areas, or more comprehensive spatial aspects reflecting both tiers, would be considered. This therefore raises concerns that that there will be no strategic land use policy elsewhere, with abrupt and ill-informed policy changes at the often-arbitrary cliff-edge border of the national designations. There is a real danger that areas which are not nationally designated will be ill-considered or ignored. Worse still, there is an implicit assumption that this exercise should only be concerned with high-grade, important, or 'the best' areas, with no recognition of the role or the potential of those lower down the order, which need policies to enhance them and to enable them to play a fuller role. As a result, there could be no such thing as a spatially cogent national development framework.

Habitat Sites

At p6 the ISA report confusingly scopes in these nationally important sites: yet they are considered (again) specifically in the HRA report covered by Question 1b of the Consultation. Comments are therefore only made there.

Landscape

The conservation, enhancement, and understanding of landscape is the key activity and raison d'être of CPRW which this year (2018) celebrates its 90th anniversary. While national landscape designations may be said to have 'cherry-picked' some of the country's finest areas, it is a generally recognised principle that 'all landscapes matter', as articulated most completely in the Preamble to the European Landscape Convention. Consequently, it is impossible and unhelpful to consider this topic at all in an NDF without such a spatially comprehensive approach and a parallel and informed consideration of the land uses which form and help maintain our landscapes.

On p10 under the heading 'Appraisal of NDF Objectives' the ISA Report claims it has '*strengthened consideration of landscape*' (NDF objective 6). Where is the evidence? Where is the detail? Then in 6.3 p11 we find this refers to Nationally Important Landscapes only; locally special landscapes are not included, and the comprehensive approach described above is not even on the agenda.

ISA Framework Appendix A – omissions

This Appendix consists of a series of tables setting out '*decision aiding questions*' which the NDF should address. The final Table on p37 includes three key items namely, '*Does the NDF create opportunities ... ?*
... within which soil quality can be maintained and/or enhanced?
... to protect peatland?
... to develop brownfield land where this is sustainable?

As explained here in answer to Question 3a below, none of these important issues is dealt with satisfactorily, and the word 'peat' is never even used in the body of the NDF.

Q1b	Do you have any comments on the Habitats Regulations Assessment (HRA) Preliminary Screening Report?	X
	Yes	X
	No	
Comments		
Habitats Regulations Assessment		
<p>We note the conclusion in Summary and Next Steps p22, 5.1.3. that:</p> <p style="padding-left: 40px;"><i>'Under the Habitats Regulations, it is necessary to assess the potential in-combination effects of the NDF with other current or proposed, Plans and Projects. However, there is insufficient detail within the current preferred option version of the NDF to allow for a meaningful in-combination assessment to be completed'</i></p> <p>Para 5.1.5 also explains that a further detailed HRA Screening will be undertaken and a draft HRA will then be published alongside the draft NDF.</p> <p>We are concerned that the scope of the assessment (when it is eventually made) will be confined to Natura 2000 sites.</p>		

As with landscapes, we believe that all habitats matter, in 'every part of Wales', as stated in the Environment (Wales) Act 2016. An NDF worthy of its name should be scoped so as to include both recognition of the top tier and support for the enhancement and enrichment across the environmental spectrum. There is also a need to stress the interaction between habitats and landscape, and to include consideration of the land uses and policies that can or could sustain them.

Q2a	Do you agree the NDF Vision is clear and, ambitious, yet realistic?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	X

Further comments

We disagree because of major omissions affecting the environment of rural Wales.

Fundamentally, we fail to see how the NDF embraces the key roles of existing rural agencies, such as NRW and Cadw; seeks to achieve harmony with Planning Guidance, LDPs; and will be reflected in the ongoing PPW10.

There is no recognition of the key importance and breadth of vision set out in the **European Landscape Convention** which provides a comprehensive template for an exercise of this type. There is also no reference to the Welsh Government's **LANDMAP** system or the wealth of detail it includes. The ISA report and HRA assessment focus only on nationally designated areas, fail to consider the land use spectrum and have no vision to enhance those areas which are not already recognised as of national significance. Specifically, the NDF fails to have any wording to give protection to locally important landscapes (such as Special Landscape Areas), and other specific habitats, thus failing to recognise key aspects of diversity.

There is also no reference to agricultural land quality, notably as defined in the Welsh Government's **Agricultural Land Classification** as updated, expanded and issued in November 2017. Although it must be used to underpin a strong land use policy to protect Best and Most Versatile (BMV) areas from development pressures, it is not just about farming or the location of RE schemes. It should be a fundamental building block for the NDF to provide guidance on optimal land use across the whole spectrum.

As an example, we note that in the Powys LDP Inquiry (2018) the first opportunity to use the new ALC to inform policy was not taken and that despite instruction from the Welsh Government its withdrawn predecessor was used.

We emphasise the need to work more closely with neighbouring countries, (specifically in the emerging context of Brexit) but are concerned that no mention is made of the very special relationship with the Republic of Ireland.

We also want to flag up very strongly the pervasive West-East economic, land use and cultural linkages across the English border and consider that this relationship is not fully explored in the relevant parts of the NDF. Specifically, we feel that there should be consideration of cross-border impacts of development in Wales on English designated landscapes, and recognition of the high quality of Welsh landscapes that adjoin the AONBs in England. Development such as grid connections could also impact adversely on designated and locally special landscapes across the Border.

Q2b	Do you believe any changes to the NDF Vision are required? If so, what are they?	X
	Yes	X
	No	

Comments

The NDF should:

Remedy the omissions set out in our responses to questions 1a, 1b and 2a with special reference to the ISA Framework's unanswered Questions;

Extend its scope to areas outside nationally-designated areas and habitats;

Produce tangible evidence of its 'strengthened consideration of landscape';

Incorporate the ethos and scope of the European Landscape Convention;

Incorporate the evidence-base represented in LANDMAP;

Incorporate the evidence-base represented by the Welsh Government's Agricultural Land Classification and reflect the importance of the Best and Most Versatile (BMV) land;

Bring forward the updated version of its HRA screening;

Be more specific in its aims to improve air quality;

Explain how the eventual NDF is to be reflected in Planning Policy and Guidance, especially an updated TAN8;

Explain how the eventual NDF is to be reflected in Local Development Plans and Supplementary Planning Guidance;

Explain how Planning Conditions can be devised to deliver these objectives, and how Enforcement will guarantee that delivery.

Q3a	Do you agree with the NDF Objectives?	X
Agree		
Neither Agree nor Disagree		
Disagree		x

Comments

NDF Objectives p13.

Details are in Appendix A (NDF Issues) and confusingly labelled sub-Appendices A to I. Moreover, the sub-Appendices (shown below in brackets) do not relate directly to the list of NDF Objectives in section 3.

1. Climate change, decarbonisation and energy - Appendix A (B) p11

This is a key issue for the NDF, for its consequential impacts as well as its primary role. The so-called 'Key Spatial Issues' are merely selective and superficial pen-portraits of the regions, which are in any case not internally uniform or spatially distinct. The texts on various technologies fail to grapple with the energy conundrum and its environmental consequences.

North Wales: There is an identified need for new grid infrastructure to transmit the electricity produced by energy projects in the Anglesey Energy Island initiative. Yet there is no spatial analysis, no criteria for siting developments, and no reference to undergrounding. The concept of Community benefit is a red herring. There is absolutely no evidence in Wales of this having any significant economic or social impact. All RE investment is front loaded, employment is temporary and unlikely to be local. At least Wylfa Newydd will provide 800 permanent jobs; compared to the trivial levels from wind and solar projects.

Mid Wales has '*potential for large scale renewable energy projects as identified in the existing Strategic Search Areas for wind energy*', together with new infrastructure linking to English consumers.

This text is way out of date and over-simplified. There is no reference to the exhaustive conclusions of the Mid Wales conjoined windfarm Public

Inquiry in 2014, or subsequent major decisions. It fails to acknowledge that all technologies have changed significantly since TAN8 (2005) with particular growth in the capacity, size and potential impact of wind turbines. Targets have escalated, grid connections to English markets have become an integral element of Welsh policy, which is accordingly characterised by procedures relating to Developments of National Significance (DNS). Yet the NDF claims at p14 that it will identify and support sites and areas capable of delivering DNS-scale projects. Would this use Local Search Areas (LSAs) or extend the present SSAs?

Despite requiring further refinement by LPAs, the SSA assessments which TAN8 presented were devoid of proper environmental justification and public participation. Consistent with the European Landscape Convention, Aarhus Convention and basic democracy, Communities should be consulted at the earliest stage on such large strategic developments which may only proceed with their broad support, as done in England.

South West Wales is noted as having strategic importance for supply of gas imports and distribution (LNG is brought in by tankers to Milford Haven). This is described as a key transitional fuel with economic benefits for Pembrokeshire and the wider area. There are other opportunities not mentioned in the main core of the Haven Waterway Enterprise Zone, but these must be reconciled with areas of international marine habitat sensitivity and coastal landscapes of the National Park as is indicated in the Welsh National Marine Plan (mentioned on p11).

In **South Wales**, Swansea – Cardiff- Newport and the Valleys are identified as the primary urban resource with scope for decarbonisation, energy efficiency, heat networks and buildings/site energy generation. It seems to CPRW that the potential in these urban and urban-fringe areas has been under-utilised at the expense of extensive wind developments in and around sensitive parts of rural Wales. We would also like to see a policy to promote more solar panels in such areas and on industrial, commercial and domestic rooves.

The NDF also adds (p12) that Welsh Government objective to establish a **bespoke infrastructure consenting process** which is responsive to business and community needs, to support sustainable economic growth and to decarbonise our energy supply. It provides no details but states that '*Decisions arising from this streamlined process are intended to be in accordance with NDF onshore*'. We do not understand what 'NDF onshore' is, nor can we find any other reference to it.

We are alarmed at the claims that policies in the NDF can '*provide certainty to renewable energy promoters*' and encourage growth in the renewable energy sector. The concept of 'certainty' seems to indicate that schemes might not continue to be subject to planning consent, conditions, enforcement and monitoring. These are already far from

satisfactory as we indicate in more detail our response to Questions 5d and onwards.

We note that the 31st May 2018 Consultation on planning use classes and permitted development states at 1.6 (p1) that '*Our policy commitments to expand renewable energy and telecommunication provision mean we have considered whether additional opportunities exist to remove the need for planning applications for such infrastructure*'. Examination of later sections of that text suggest that this ambition is limited to relatively minor proposals and is subject to a series of sensible caveats. Nevertheless, the NDF reference to 'providing certainty' remains of concern in that context.

We cannot understand why the tidal energy schemes listed in **Appendix A (D) Economy** were not also included in this **Annexe A (B) Climate Change, decarbonisation and energy**. Tidal energy schemes are proposed in Swansea, Cardiff, Newport and Colwyn Bay. The Severn estuary is a very important ecological site. Tidal lagoons are probably less damaging than barrages, have far greater capacity, are more capable of mitigation and can have a wider range of potential benefits.

2. Economic prosperity and regeneration - Appendix A (D) Economy p22

In rural areas the NDF states that as well as agriculture, tourism and other forms of diversification are also key economic drivers and need to be supported. But it fails to acknowledge that the landscape and habitats are economic resources in themselves and policies need to be in place to help sustain them through primary land uses for farming and forestry. Particularly in the uplands and Less Favoured Areas there is a continuing need for financial support to the farm sector which is configured to sustain sub-economic land uses in ways that maintain both the local communities and their role in conserving and enhancing landscapes and habitats.

The NDF rightly stresses the uncertainties caused by the Brexit negotiations. The whole question of the EU Common Agriculture Policy is in doubt, including the latitude available to member states under the present regime, and its future (if it has one) given a hard Brexit or a 'No Deal'. We don't expect the NDF to discuss these impacts in the present policy vacuum - but we do expect it to revisit this conundrum when the UK's position solidifies, even if we decide eventually to stay in the EU.

One aspect of concern to CPRW is the future of the uplands of rural Wales where farming and thus the whole economy is critically dependent on financial support, with or without Brexit. This acute problem cannot be ducked just because Brexit is unresolved – it is an integral part of the land use system affecting our most important landscapes and habitats and needs some indication in the NDF as to its longer-term future.

Nevertheless, the fact remains that 'mainstream' farming and forestry are the main productive uses and key to the economy of rural Wales. CPRW would expect the NDF to contain a clear vision for these primary producers and the value-added developments that they enable, such as growing, processing and marketing home-grown vegetables. The absence of references to conserving BMV land within the current Agricultural Land Classification (see 2a and 2b above) suggests that this has not been properly taken into account.

Under the heading Rural (p28) the NDF states that tourism and other forms of farm diversification are also key economic drivers. While this needs to be encouraged, lateral thinking is required as many small industries can be land based and form part of the circular economy.

CPRW welcomes the proposal to set up a Valleys Landscape Park (p24) as part of its approach to stimulating the economy but would comment that the title should mean what it says and not be overtaken by other interests. If successful, this concept could become the norm throughout urban and semi-rural areas of Wales. There seems to be no mention of an approach equivalent to the National Forest in England where large areas have a land use plan and suitable incentives to increase the extent and quality of woodland in the wider landscape.

3. City Regions and Growth Deals - Appendix A (D) Economy as above

Because of the location of population, the south and south-east of Wales is becoming like London and the south-east is to England. It feels as if it is draining young people, investment and new national developments away from the more rural areas of north, mid and south-west of Wales. The M4 Motorway relief road which we oppose as too damaging is a symptom of this convergence. If Brexit goes ahead it appears that the Republic of Ireland will ship more goods direct to the continent from their own newly established deep-water ports, instead of trucking them via ferries through south or north Wales. This potential reduction in lorry freight traffic should lead to a rethink on the newly proposed M4 Relief Road.

We want to encourage more parts of the Welsh Government to be moved away from the south and south-east and into other areas of Wales and to stimulate the sub-economies of rural towns. New National Projects should be encouraged to develop outside the south and south-east.

4. Rural Wales - Appendix A (D) Economy as above

4.1. Support in principle the aim of strengthening rural communities and their populations, but rural Wales is not ubiquitous. Scale, diversity and location mean that the individual character and needs of such local places are not lost in a uniform aim. Rural Wales should be recognised

as a multi-functional asset. Its landscape and environment play a crucial part in the economy of the whole country.

4.2. Support the aim of sustaining resilience and diversification in the rural economy, in principle, but not if it were to compromise its landscape and habitats. Primary land uses (such as agriculture and forestry) should become more resilient by being encouraged to produce more than just high-quality food and timber by means of parallel goods in terms of tourism, conservation and recreation; and by producing value added products in their local economy. Nevertheless, this should not produce carte-blanche for proliferation of industrial-scale livestock enterprises which do not need to be farm-located (e.g. chicken sheds in Powys); or the escalation of ultra-large dairy farms with negative consequences for the surrounding rural catchment and the safety of its users.

5. Housing - Appendix A (E) Housing

5.1. We support the principle of delivering affordable and rented homes which can help sustain the indigenous population in settlements within rural areas. Nevertheless, this should be subject to a degree of control over second homes and some flexibility in the allocation and location of affordable housing in development consents. The challenge of affordable homes for younger people in the rural communities is well-known.

The challenge of an ageing population (see also Appendices 10, 12 and 13) is a key problem for the NDF. The retiring indigenous population can be priced out of suitable homes, even if they are available, exacerbated by disproportionate numbers of incomers. Widowed partners tend to be left unable to drive in rural areas with no suitable public transport. There is no flexibility or lateral thinking on alternative housing where parents can live close to children for support.

Despite a prompt to do so in the ISA Framework, there is no discussion in the NDF of the need for and desirability of utilising Brownfield sites for development where this is sustainable. This would relieve pressure on greenfield sites.

6. Natural Resources, Circular Economy and Flooding - Appendix A (Fi – iii)

6.1 Strengthen the resilience of biodiversity assets.

We have reservations about the pressures from economic development, even on Natura 2000 sites. Non-designated sites are even more vulnerable, and there is a need to recognise the value and importance

of all habitats and create new sites at both national and local level. We are nevertheless relieved to see that the NDF strategy intends to lead to better resilience of biodiversity assets and the creation of broad buffers around sites and connecting green corridors between them and 'stepping stones' for the movement of species. We also wish to see protection for roadside verges, the reservoir of wild flowers, and protection for and suitable management of the total hedge resource because of the variety, extent and linkages these habitats and landscapes provide.

6.2 We support in principle the aim to **achieve sustainable management of our natural resources** and to facilitate nature recovery, but there is no reference in the NDF to the wider environment where these aims are equally necessary. The NDF maintains that our natural resources are air, land, water, wildlife, plants and soil. This omits rock/minerals (both as an economic resource and as RIGS – Regionally Important Geological Sites), the sea and its shore, landscape (man-made and semi-natural) and habitats. Forests (as natural and managed woodland) should be considered separately from other 'plants'.

Despite the prompt in the ISA Framework the NDF does not address the **maintenance and enhancement of soil quality**. This needs to be part of a national strategy and is apparent as a crucial gap in the NDF when Local Development Plans accept Best and Most Versatile agricultural land as sites for development. Once disturbed by development it will degenerate into a far less valuable asset even if returned to agricultural use.

The ISA Framework's prompt to **create opportunities to protect peatland** is also missing from the NDF. There is no other mention of the word peat or its derivatives in the NDF. Yet there is general agreement that this is an absolutely key resource for the ecology, hydrology, and landscape of the uplands of Wales, and requires suitable land use management to enable it to contribute to the challenge of climate change.

We are also disappointed that sufficient attention has not been paid to the related far-reaching question of water quality, management, extraction, storage, distribution and conservation. This is sufficiently important to require a separate topic and strategy within the NDF.

We support the opportunities for restoration or creation of habitats, and the creation of habitats on a landscape scale, although we would need to see the detail before fully endorsing such a plan. We look forward to seeing the map of designated sites which will provide a view of the extent of ecological networks and indicate the connectivity between them as wildlife corridors. But this map should also include local non-designated sites as the connecting tissue between the designated sites. We welcome the provision of edge of settlement habitats and

environmental sites to improve the quality of life and to maintain the habitats of local species. We also look for the protection of non-designated but important local sites without which designated sites would exist in isolation.

6.3 To protect and promote nationally important landscapes Appendix A (Fiii)

We are concerned that this topic only appears as one Objective in sub-Appendix F(iii) Natural resources – Flooding (p52) and no specific text is provided elsewhere in this section. Surely this is an oversight. Rather than being subsumed into the unrelated topic of Flooding, this important matter should be given greater and independent prominence in a dedicated section of the NDF. It should cover not only nationally important landscapes but local and regionally important ones including those indicated in LANDMAP and those identified by LPAs as SLAs (Special Landscape Areas). The NDF fails to mention the role of primary land use policies such as agriculture and forestry in securing these aims.

6.4 To provide strategic direction to manage and adapt to the potential threat of flooding. Appendix A (Fii)

We support efforts to prevent and manage potential flooding including the management of catchments and land uses, including the conservation of soils. This can also have habitat benefits if properly designed. The potential effects of rising sea levels and river profiles due to climate change should also be discussed in this context. The principle should extend to whole river systems and should incorporate proposals which are sensitive to their habitats, landscapes and biological resources. Nevertheless, we are alarmed that lack of enforcement in the planning system contributes to the problem of local flooding. Permitting large areas of hard standing within and around new builds and failure to assess the absorption level of soils can increase the amount of water run-off. Failure to adequately monitor developers can lead to excessive water ingress problems for neighbours and public spaces such as playing field.

6.5 Support the development of the circular economy Appendix A (Fiii)

The concept is made to seem unnecessarily narrow, but we see this topic in a wider context. It should not be just about re-using old materials, recycling and refurbishing. It should include a more imaginative approach to reduce waste, obsolescence and pollution in the first place, including the role of the natural environment in absorbing pollutants. A broader aspect of the Circular economy is to ensure the

development of brownfield areas, whether in substantial urban-edge zones or individual sites. This can improve landscape quality and relieve pressure on greenfield sites

6.6 To support the reduction of pollution and improve air, noise and water quality. Appendix A (Fii and Fiii)

As above, this should include a more imaginative approach to reduce waste, obsolescence and pollution in the first place, including the role of the natural environment in absorbing pollutants. The text does not include the necessity of conserving and improving soil quality, the need to protect surface and ground water and aquifers from excessive extraction.

Noise quality. Enforcement against noise from wind turbines is often ineffective or absent. This must be addressed before more wind turbines are rolled out around communities in the settled lowlands.

Air quality. AQMA Air Quality Management Areas seem to be monitoring areas rather than actively finding solutions to change traffic habits to reduce trapped pollutants. New roads and developments generate traffic producing more pollution but should be mitigated by more extensive vegetative screening conditions.

Water quality. As noted above, this topic has not been sufficiently addressed in the NDF. A whole new section should consider catchment land use, including agriculture, forestry and permitted development.

6.7 To support the delivery of the objectives of the Welsh National Marine Plan – Appendix A (Fiii) p52

CPRW's core concerns are not confined to the terrestrial qualities of Wales, which is surrounded on three sides by internationally important waters, and which has a coastline which contributes to much of its identity and attractiveness. Initiatives such as the Wales Coast Path are key factors in the country's appeal and tourism economy. Augmenting this its Blue Flag beaches and rich marine habitats are of paramount importance.

It is unacceptable for the NDF to restrict its reference in this important topic to another document (the WNMP) which it then only mentions in a simple headline. It should provide a fair summary of relevant points in the WNMP and explain how they would be incorporated in the NDF itself.

We are pleased to see that Seascapes are defined in the WNMP as including coastal land margins but wish to see more attention paid to the entirety of the coastline as a continuous entity irrespective of individual designations. The section on visual impact of large wind turbine arrays on the coastline needs more detail.

7. Culture and Heritage - Appendix A (A)

This does not recognise that there is local diversity or that there is a need for bi-lingual flexibility in certain areas of Wales.

When promoting our existing culture - the NDF identifies sports facilities as part of our existing culture but so are theatres, cinemas, local halls for amateur events, churches and chapels and land uses which unite the indigenous population and can contribute to the local economy.

8. Transport - Appendix A (G)

This does not include the need to protect and enhance the footpath and bridleway networks in plans for conventional road and rail transport routes.

M4 Motorway Relief Road.

The proposals to construct a relief road across the Gwent Levels will be heavily destructive of landscape and wildlife for future generations. The draft NDF objectives for transport are 8.1 *'To support a reduction in travel by private vehicles and a growth in walking, cycling and public transport'* and 8.2 *'To facilitate the delivery and improvement of key transport infrastructure to decarbonise travel'*.

The M4 proposals are patently and massively in conflict with those objectives. They will increase traffic levels. They will inhibit public transport and active travel as alternative travel modes. They will lead to increased carbon emissions and air pollution despite the unconvincing efforts of the consultants to argue the opposite at the recent Public Inquiry. The M4 Black Route is a 20th century vision for a society in an era before we faced climate change. Yet its high costs are already inhibiting the Government's plans for sensible travel infrastructure around Newport: the complete failure to advocate East-West trams in the first phase of the Metro, or even the overdue railway station at the start of the Black Route in Magor exemplify the chilling impact of the M4 proposals. Unless the Black Route - as the largest and most environmentally damaging infrastructure project in Wales - is dropped then the entire credibility of the NDF will be fatally undermined.

Instead, the focus should be on improvements to existing networks, and their integration via buses and cycle ways with an improved rail and new Metro network, including improved rail links between north and south Wales, and north-south transport links and networks including a range of modes.

9. Welsh Language - Appendix A (H)

Wales is fortunate to be a bi-lingual nation. We support the aim to increase the number of Welsh Language speakers and the need for the planning system to be pro-active in creating favourable conditions to aid the retention and increase in the use of the language. We support the availability of suitable opportunities to learn Welsh in those areas which historically had fewer Welsh speakers, whilst fostering the existing culture in other areas. This helps to sustain the cultural identity of rural areas in particular.

10. Health and Well-being - Appendix A (I)

CPRW supports the text but would stress the importance of high quality local landscapes and recreational networks of all types of public rights of way to the well-being of all age groups and abilities in the local community.

Would like to see greater opportunities for preventative care in rural areas which could reduce reactive care treatment. We also stress the need to recognise and cater for the problems of rural residents of all ages in isolated rural communities.

Transport to and from hospital - rural residents in particular are reduced to sleeping in hospital chairs or floors because of no available transport home following emergency treatment.

We support the NDF investing in homes to provide warmth and energy efficiency but also need to encourage street and garden shrubs and trees to encourage shade in summer heat episodes. We would support measures to increase highway trees in towns and villages, plus management of trees in hedgerows.

The NDF should set goals for the production of local food so transporting produce over distances can be reduced. They have now got up to date information on the best and most versatile land available for food production. This land should be used for its best purpose and conserved for the well-being of future generations.

11. Digital infrastructure - Appendix A (C) Digital connectivity

We support enhanced mobile and wireless coverage across Wales which has a special role in rural communities, allowing independent enterprises to prosper, publicise their work and operate efficiently.

We welcome the need for authorities and operators to work together to minimise the number of masts needed even though some are permitted development.

We look for cooperation between operators and planning authorities across borders and boundaries to minimise the numbers and sizes of masts required. We also look for them to be minimised in urban areas

12. Cohesive Communities – Appendix A (I) Health

We support the aims of delivering cohesive communities with opportunities for all ages

We would like to include the need to support linkages between rural communities for mutual benefit which could also assist the circular economy.

Q3b	Do you consider any additional objectives are required? If so, what are they?	X
	Yes	X
	No	
Comments		
<p>We wish to see a mechanism to guarantee that conditions attached to planning consents will be enforced in order to deliver the NDF objectives.</p> <p>We wish the NDF to include the following objectives:</p> <p>To encourage the protection and enhancement of the local distinctiveness in our landscapes and townscapes.</p> <p>To protect our Best and Most Versatile agricultural land and actively encourage its use for food production and added value processing.</p> <p>To make sure LPAs allow and recognise multi stranded small developments in the countryside that may be partially land based, but whose value-added development draws on other local and Wales produced raw materials.</p> <p>To rewrite TAN8 in view of evolving policy changes, the increased size of wind turbines and the development of large scale solar panel installations.</p> <p>To recognise that non-designated local landscapes and habitats are worthy of protection.</p>		

Q3c	Do you consider any of the NDF Objectives should be amended or removed?	X
	Yes	x
	No	
Comments		
As suggested throughout the Questionnaire.		

Q3d	Do you have any comments on the assessment of the NDF Objectives as set out in the Integrated Sustainability Appraisal interim report?	X
	Yes	x
	No	
Comments		
These are set out in our response to Question 1a		

Q4a	Do you agree the NDF Options have been considered appropriately, in order to identify key strengths and weaknesses, and inform the Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	x
	Disagree	
Comments		
It is difficult to give a clear answer to this confusing document, but the overall impression is not favourable due to its convoluted structure, lack of		

inter-connected thinking, key omissions, and failure to explain how its findings would be made operative in policies, guidance and decisions in Wales.

Q4b	Do you have any comments on the assessment of the options as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report?	X
	Yes	x
	No	
Comments		
This is set out in our response to Question 1b		

Q4c	Are there further alternatives/options that should be considered for the strategic direction of the NDF?	X
	Yes	x
	No	
Comments		
More attention should be paid to localism, diversity, spatial integrity, complex land uses, land quality, (ALC), landscape (LANDMAP), relationship to local plans, and planning enforcement.		
Q5a	Do you agree with the NDF Preferred Option?	X
	Agree	
	Neither Agree nor Disagree	X
	Disagree	
Comments		
The chosen Option is understandably a hybrid, but we would like to see emphasis on parts of Option 2 'Creating strong Communities'.		
However, we note paragraph 5.1.3 page 22 of the Habitats Regulations assessment where it states the following (repeated in Question 5b):		

Under the Habitats regulations it is necessary to assess the potential in-combination effects of the NDF with other current or proposed plans or projects. However, there is insufficient detail within the current preferred option version of the NDF to allow for a meaningful in-combination assessment to be completed.

Q5b	Do you have any comments on the assessment of the NDF Preferred Option as set out in the Integrated Sustainability Appraisal interim report and preliminary Habitats Regulations Assessment screening report?	X
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Yes	X
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No	
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Comments

Habitats Regulation Assessment

It is obvious that until more information is supplied on the detailed implications of the NDF proposed policies no proper assessment can be made on impacts on habitats etc.

This is conceded at paragraph 5.1.3 p22 of the Habitats Regulations assessment where it states the following:

'Under the Habitats regulations it is necessary to assess the potential in-combination effects of the NDF with other current or proposed, Plans, or projects. However, there is insufficient detail within the current preferred option version of the NDF to allow for a meaningful in-combination assessment to be completed.'

Q5c	Do you agree all the NDF Objectives are adequately addressed in the NDF Preferred Option?	X
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Agree	
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Neither Agree nor Disagree	
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Disagree	X
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Comments

As indicated in the answers to several questions above:

Landscape and Environment aspects are incomplete and insufficiently thought-out.

Agriculture and forestry area insufficiently considered as primary land uses.

Relevant statutory data sources not recognised or used.

Key topics indicated in the ISA Framework report have not been included.

Q5d	Do you agree the NDF Preferred Option complements the NDF Vision and has the potential to help deliver it?	X
	Agree	
	Neither Agree nor Disagree	
	Disagree	X

Comments

We don't agree, but this is because without proper reflection in Local Plan policies to deliver the vision it cannot succeed. Conditions attached to planning decisions to meet its requirements will be put in by the LPA but will be worthless unless enforced. CPRW stresses that appropriate Conditions are an integral core element in planning consents. If they are breached or not carried out, then the consent should no longer be regarded as valid.

We draw attention to a recent article in *Planning* magazine of 20th July 2018 in its 'In Practice' section on p26. This advocates a rigorous and imaginative approach to the enforcement of decisions and conditions which can be effective, self-funding and even benefit LPAs financially.

It points out that: '*In most cases, flouting planning regulations is not a criminal matter. It becomes one once a planning authority has issued an enforcement notice, and that notice has been ignored*'. At that point, the Court of Appeal found in 2010 that LPAs could use the Proceeds of Crime Act 2002 (POCA) to recoup any profits made by developers who had disregarded enforcement notices.

A strong approach of this type, backed up by regular monitoring, would send a clear message to LPAs and applicants that 'Conditions mean Conditions' and that both the spirit and the letter of planning decisions would be honoured with minimal resort to litigation. Monitoring and enforcement would then no longer be 'cinderella' activities.

CPRW feels that this lies at the coalface of development issues and is concerned that in its framework overview the NDF has not grasped this nettle. It should do so.

Q5e	Do you agree it is important for the NDF and Planning Policy Wales (PPW) to adopt similar and complementary structures, to help make clear links between the two documents?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Comments		
This is vital, so that people can understand how the objectives are delivered at each stage - always assuming that the conditions in place to support the Vision are enforceable and enforced.		

Q5f	The NDF Option is developed around 5 themes, reflecting the structure of PPW: Placemaking; Distinctive & Natural Places; Productive & Enterprising Places; Active & Social Places; Wales' Regions. Do you agree with this approach?	X
	Agree	X
	Neither Agree nor Disagree	
	Disagree	
Comments		
The theory is good but complex; the themes are somewhat artificial and tend to be overlapping. In any case, it will fail to be delivered if it is not backed by strong enforcement		

Q5g	Do you agree with the Spatial Issues and Strategic Policy Direction outlined within the NDF Preferred Option?	X
	Agree	

Neither Agree nor Disagree	
Disagree	X
Comments	
<p>There is not enough detail about locations or criteria leading to locational decisions for us to comment properly.</p>	

Q5h	Do you agree the NDF Preferred Option offers a basis for the co-ordinated delivery of Welsh Government priorities outlined in <i>Prosperity for All: the national strategy</i> ?	X
	Agree	
	Neither Agree nor Disagree	X
	Disagree	
Comments		
<p>It forms a basis but has not enough detail. As we have mentioned before, unless the principles of the NDF are upheld in decisions, enforcement and subsequent monitoring, this ambition is pointless as all these considerations will be in disarray</p>		

Q5i	Do you agree the NDF Preferred Option could be formulated or changed so as to have increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language?	X
	Agree	x
	Neither Agree nor Disagree	
	Disagree	

Comments

It needs positive projection of Welsh with funding for workplace or work time lessons plus encouragement, financial inducement to those seeking work to learn Welsh.

Q6a	Do you agree with the proposed changes to the Statement of Public Participation?	X
	Agree	
	Neither Agree nor Disagree	X
	Disagree	

Comments

CPRW is pleased that everyone is considered to be a stakeholder.

There appears to be no guarantee of further consultation on this NDF before publication even though the Habitats Regulations text noted it that was short on detail. We need to see more detail before we can finally appraise it. We would like to see a draft version with more detail including for example what criteria will be used to determine the sites for renewable energy projects.

Q6b	Are there any other changes we should make to the Statement of Public Participation?	X
	Agree	
	Neither Agree nor Disagree	X
	Disagree	

Comments

Yes. CPRW wishes to see a final draft version of the NDF published and publicised. But it must contain more detail, because as it is, it is woolly

and imprecise and lacks detail and clarity as to how it will be delivered. We also wish to see responses from stakeholders made available on the internet.

How to respond

Please submit your comments by **23 July 2018**, in any of the following ways:

Email	Post
<p>Please complete the consultation form and send it to: ndf@gov.wales</p> <p>[Please include Preferred Option consultation in the subject line]</p>	<p>Please complete the consultation form and send it to:</p> <p>National Development Framework Team Planning Policy Branch Planning Directorate Welsh Government Cathays Park Cardiff CF10 3NQ</p>

Additional information

If you have any queries about this consultation, please:

Email: ndf@gov.wales

Telephone: 0300 025 3261